

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-39

Respondent: Lynelle J. Reney
Title: Director

REQUEST: AT&T Communications of New England & Covad Communications, Inc., Set #1

DATED: June 6, 2001

ITEM: ATT/Covad 1-3 Referring to page 4 of the Answer of Verizon Massachusetts to the Complaint in this proceeding, Verizon states that "AT&T and Covad received multiple explanations concerning the application of the charges while the tariff was being reviewed before Department approval."

- a) Identify all such "multiple occasions," by the proceeding or other occasion, in which such explanations were provided;
- b) Identify the approximate dates when such explanations were provided to AT&T and Covad;
- c) Identify the names and titles of the Verizon representatives who provided such explanations;
- d) Describe the substance of such explanations;
- e) If such explanations were written or transcribed, provide copies.

**SUPPLEMENTAL
REPLY:**

Verizon's Senior Program Manager Wayne Madden communicated with AT&T's Denise Henderson on 2/11/01, 2/14/01, 2/22/01 and 2/23/01 in order to discuss various aspects of the billing process. (Database notes attached)

Regular conference calls were also held in which discussions regarding billing practices and policies took place. For example on 1/8/99, 1/20/99 and 4/8/99 Wayne Madden held such conference calls with AT&T personnel.

Further these calls continued with Verizon Program Manager Carol Ledonne on 4/18/00, 7/14/00, 7/25/00 and 11/26/00.

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Communications, Inc., Set #1

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ITEM: ATT/Covad 1-19 Referring to the attached list of collocation sites occupied by
AT&T and Covad (Attachment A to this First Set of Information
Requests),

- a) Please state whether Verizon agrees or disagrees that this list identifies each and every collocation site subject to the terms of the intrastate tariff;
- b) If Verizon believes that certain collocation sites listed in Attachment A are not subject to terms of the intrastate tariff, please identify each and every such collocation site;
- c) If Verizon believes that additional collocation sites not listed in Attachment A are subject to the intrastate tariff, please identify each and every such collocation site;
- d) For each collocation site listed in Attachment A and any additional sites identified in Verizon's response to Information Request No. 19(c), identify the first effective date on which Verizon deemed the site subject to and for which AT&T was assessed charges for DC power;
- e) For each collocation site listed in Attachment A and any additional sites identified in response to Information Request No. 19(c), identify the type of collocation (traditional physical or virtual);

ITEM: ATT/Covad 1-19
(cont'd)

- f) For each collocation site listed in Attachment A and any additional sites identified in response to Information Request No. 19(c), state the number of square feet provided;
- g) Identify the number of feeds provided at each site listed in Attachment A and at any additional sites identified in Verizon's response to Information Request No. 19(c). For purposes of this Information Request No. 19, a "feed" is defined as a single line feed, not a feed pair, (in the terms of the Collocation Application, an A or a B feed, but not an A and B feed pair). If this number has changed between the first effective dates of charging for DC power identified in Information Request No. 19(d) and the filing of the Complaint in this proceeding, identify how and when such change(s) occurred;
- h) Identify the fused amp capacity delivered by means of each feed identified in Information Request No. 19(g). If this number has changed between the first effective dates of charging for DC power identified in Information Request No. 19(d) and the filing date of the Complaint in this proceeding, identify how and when such change(s) occurred;
- i) Identify the maximum load amp capacity for which each feed identified in Information Request No. 19(g) was designed. If this number has changed between the first effective dates of charging for DC power identified in Information Request No. 19(d) and the filing date of the Complaint in this proceeding, identify how and when such change(s) occurred;
- j) For each collocation site listed in Attachment A and for any additional sites identified in Verizon's response to Information Request No. 19(c), identify the total load amps that Verizon is able to deliver through the total number of feeds provisioned;
- k) For each collocation site listed in Attachment A and for any additional sites identified in Verizon's response to Information Request No. 19(c), identify the total load amps that AT&T equipment located at such site is capable of drawing;

ITEM: ATT/Covad 1-19
(cont'd)

- l) For each collocation site listed in Attachment A and for any additional sites identified in Verizon's response to Information Request No. 19(c), provide copies of each and every bill for DC Power charges from the first effective date as identified in Information Request No. 19(d) until the filing date of the Complaint in this proceeding;
- m) For each collocation site listed in Attachment A and for any additional sites identified in Verizon's response to Information Request No. 19(c), provide copies of Collocation Applications, including any and all application amendments and other correspondence relating to DC power requirements as requested by AT&T;
- n) For each collocation site listed in Attachment A and for any additional sites identified in Verizon's response to Information Request No. 19(c), identify what Verizon contends is the amount of DC load amps requested, ordered, or applied for by AT&T at each site;
- o) If Verizon contends that unwritten communications have occurred that affect the amount of amps or number of feeds at any of the collocation sites listed in Attachment A or otherwise identified in Information Request No. 19(c), please identify the Verizon and AT&T individual personnel who have had such conversations, the substance of the conversations, the approximate date of such conversations and how these conversations relate to the DC power requirements requested or provided at each site;
- p) If Verizon is aware of occasions in which AT&T representatives explained to Verizon representatives the power requirements of any collocation site listed in Attachment A or of any additional sites identified in Verizon's response to Information Request No. 19(c), please identify such occasions, including dates, Verizon and AT&T representatives involved, and the substance of such explanations;
- q) Provide the tariff language, including the dates in which the tariff containing such language was filed and approved, that Verizon contends applies to billing for DC Power at each collocation site listed in Attachment A and for any additional

ITEM: ATT/Covad 1-19
(cont'd)

sites identified in Verizon's response to Information Request No. 19(c). If Verizon contends that the applicable tariff has changed since the first effective date of any collocation site (as identified in Information Request No. 19(d)), please provide each such tariff language applicable to such collocation site(s) and the dates of applicability;

- r) For each collocation site listed in Attachment A and for any additional sites identified in Verizon's response to Information Request No. 19(c), please state whether Verizon provided a written document to AT&T, prior to any bill, which notified AT&T of the amount Verizon intended to charge AT&T for DC Power provided.

**SUPPLEMENTAL
REPLY:**

In further response to 19 (g), (h) and (i), Verizon MA states that it has provided DC power amps, feeds and fusing to AT&T and Covad in accordance with the applications submitted by AT&T and Covad and the applicable tariff. The DC power amps and feeds requested by AT&T are contained in Proprietary Attachment E, which are the collocation applications submitted by AT&T to Verizon MA. The same information for Covad is contained in Proprietary Attachment F.